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July 25, 2025

BY ECF

The Hon. Beth Labson Freeman
San Jose Courthouse
280 South 1st Street
San Jose, CA 95113

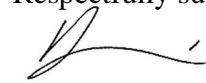
**Re: Anderson et al v. Google LLC, No. 5:25-cv-03268-BLF
Anticipated Motion for Leave to Amend**

Dear Judge Freeman:

This firm represents Plaintiffs in the above-referenced action. As noted in Plaintiffs' Opposition to Defendant's Motion to Dismiss, filed today, Plaintiffs anticipate filing a Motion for Leave to Amend their Complaint. Plaintiffs' counsel represents former Google employees on the West Coast and East Coast. Due to processing differences among EEOC regional offices, our West Coast clients received "right-to-sue" letters last year. Our West Coast clients were obliged to file this action within 90 days of receiving their letters, meaning that our East Coast clients could not be included in the initial complaint. We have already requested "right-to-sue" letters for East Coast clients, and expect to receive them within the next several weeks (if not sooner).

Google argues that the current named Plaintiffs cannot state claims under New York state or city law, and cannot serve as adequate class representatives for those claims. We disagree. However, should the Court be inclined to dismiss any New York state or city claim due to the absence of New York-based employees, we ask that the Court do so without prejudice, and with leave to amend, so that our East Coast clients can be added. This would save the trouble of our East Coast clients filing a separate action and moving to consolidate.

Respectfully submitted,



Aleksandr Felstiner